

EPA Incorporation of Yakama Technical Comments submitted January 26, 2018
Pre-RD Group Quality Assurance Project Plan (QAPP) dated January 18, 2018
Portland Harbor Superfund Site

Comment	How incorporated in EPA comments
1. This document appears to be tailored to the actual studies, but it still has some confusing sections.	Partially covered by EPA Primary Comment 1 and comments requesting clarification of DQOs and how data is reported. Beyond this, it is difficult to incorporate the comment further since it does not identify the specific sections that are confusing.
2. Section 4.2.1.1 As noted above, the sample identification rules for sample labels do not match that in the DQMP.	EPA included this comment, as written, as TBC comment #7
3. 4.2.1.1 and 4.2.1.2. The discussion of core information states that other collection information will be recorded and added to the database, and list some examples. The discussion of the surface grabs makes no mention of such information. These data are essential QA information and should be identified in detail. How the information is added to data compilation should be stated as well. At a minimum the sections should reference the appropriate FSP.	EPA included this comment, as Primary comment #5.
4. The proposed labels would specifically identify field duplicate field samples by using the same basic sample ID, with an additional "D" added. The surface sediment FSP states that duplicates would be "blind duplicates," which usually means the sample labels do not alert the labs that this is a duplicate and do not let them know the samples it is paired with, as the QAPP labeling scheme would do. However, the FSP does not indicate an alternative duplicate labeling scheme that would actually create a blind duplicate.	EPA included this comment, as written, as TBC comment #7.
5. Section 4.2.1.3 Surface Water Sample IDs. We did not see the coding of the specific water fractions in the DQMP, as refer to in this section of the QAPP. We did a search and PR2900 was not found in the DQMP. Similarly, we did not find "XAD" in the DQMP in the appropriate context.	EPA included this comment as TBC comment #10.
6. 4.2.1.8 Blanks Nomenclature. The QAPP proposes to use date and time to identify the relationship of the rinsate blanks with the other samples. Wouldn't it be simpler, and more useful, to associate rinsate blanks with the preceding regular sample? If the analyses of the rinsate showed contamination, it seems most likely to occur from the preceding sample. In addition, the normal sample collection procedure should	EPA did not incorporate this comment. The QAPP's naming procedure in conjunction with the date and times of collection will enable the data validator to associate a given rinsate blank with the appropriate samples.

Comment	How incorporated in EPA comments
<p>already record the date and time that the rinsate blank was generated in the “time collected” field.</p>	
<p>7. Section 5.1.1.1 The field QA does not appear to include regular (daily depending on the study) review and verification of the field records for accuracy and completeness, e.g., independent verification that sample container ID’s match the collection records and also match the COC forms.</p>	<p>EPA included this comment, as written, as TBC comment #14.</p>
<p>8. Section 5.1.2.2 Unless we misunderstand the term, using the appearance of samples as they are received at the laboratory is an inadequate form of field performance audit. A filled sediment container does not ensure that the sample was collected correctly. QA managers should routinely do shipboard inspections to verify all of the field procedures.</p>	<p>EPA included this comment, as written, as Primary comment #7.</p>